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January 11, 2007

VIA HAND DELIVERY

Lawrence H. Norton, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: **Matter Under Review 5881 (Club for Growth, Inc.; Club for Growth, Inc. PAC ; and Patrick Toomey, Treasurer)**

Dear Mr. Norton:

This response is filed on behalf of Club for Growth, Inc. ("Club"); Club for Growth, Inc. PAC ("Club PAC"); and Patrick Toomey, Treasurer of Club PAC (collectively referred to as the "Respondents") in the above-captioned matter.

The Complaint makes two allegations against Respondents, both of which are false. First, the Complaint asserts that Club PAC received excessive contributions from seven individuals in 2006. In fact, however, Club PAC did not receive any excessive contributions from these individuals in 2006. Second, the Complaint asserts that Club PAC knew and informed contributors that a substantial portion of their contributions to the PAC would be used to support the campaign of Tim Walberg. This also is untrue. The fact is that Club PAC did not know, much less inform contributors about, how their PAC contributions would be used.

Because the allegations against Respondents have no basis in either the facts or the law, the Federal Election Commission ("FEC" or "Commission") should find no reason to believe that Respondents violated the Federal Election Campaign Act ("Act") and dismiss the Complaint against Respondents.

THE COMPLAINT

The Complaint was filed by the campaign of Michigan candidate Joe Schwarz, Schwarz for Congress, on November 16, 2006. The Complaint makes two unsubstantiated charges against Club PAC. First, the Complaint (in Count 2) alleges that Club PAC received contributions in excess of \$5,000 in 2006 from seven individuals: Bruce Bent, Robert Lansing, David MacNeil, Virginia Manheimer, Lester Weindling, William T. Wolf, and Betty Wolfe. Second, the

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Complaint (in Count 3) alleges that Club PAC "made it clear to potential contributors to the CFG-PAC that it would use a substantial portion of any CFG-PAC contribution to support Walberg for Congress" and that Club PAC "knew that a substantial portion of the contributions received by CFG-PAC would be used to support Walberg for Congress," resulting in excessive contributions to Walberg for Congress.

The Complaint attaches as Exhibit 2 a member solicitation by the Club for separate contributions to the Senate campaign of Steve Laffey, the House campaign of Tim Walberg, and Club PAC.

The Complaint attaches as Exhibit 3 an email from Pat Toomey to Club members about the Schwarz/Walberg primary election that is dated after the Michigan primary.

The Complaint attaches, as Exhibit 4, a computer disc purporting to show contribution data for contributions by certain persons to Club PAC and to Walberg for Congress. This data, along with the interpretation of the data in the Complaint, does not match the data found on the Commission's website or as found in the reports of Club PAC, also found on the Commission's website.

THE FACTS

Contrary to the allegations in the Complaint, Respondents did not engage in any conduct contrary to the Act. Respondents simply received and reported permissible contributions to Club PAC, served as an intermediary for properly reported earmarked candidate contributions, and communicated properly with Club members.

Club PAC is a non-party, non-candidate multicandidate political committee. Affidavit of David Keating, The Executive Director of the Club, ¶ 3, dated January 11, 2007, attached hereto at Tab 1 [hereinafter "Keating Aff."]. In 2006 Club PAC received aggregate contributions of \$5,000 from each of the seven named individuals. *Id.* ¶¶ 4-5 and Exhibit A thereto. All seven of the individuals are members of the Club. *Id.* ¶ 6.

The total contributions from each of these individual members to Club PAC in 2006 were as follows:

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Bruce Bent: \$5,000

Robert Lansing: \$5,000

David MacNeil: \$5,000

Virginia Manheimer: \$5,000

Lester Weindling: \$5,000

William T. Wolf: \$5,000

Betty Wolfe: \$5,000

Id. ¶¶ 4-5 and Exhibit A thereto. The other contributions by these members cited in the Complaint (and alleged to be to Club PAC) were actually properly reported and transmitted earmarked candidate contributions. *Id.* ¶ 8 and Exhibit B thereto. None of the earmarked contributions were written to or deposited by Club PAC. Rather, Club PAC transmitted these contributions to candidates designated by the contributors in accordance with 11 C.F.R. § 102.6. Keating Aff. ¶¶ 8-9.

THE LAW

An individual may contribute up to \$5,000 per calendar year to a non-candidate, non-party political committee. 11 C.F.R. § 110.1(d). An individual also may contribute \$2,100 per election to a candidate for federal office subject to an aggregate limit of \$40,000 per election cycle. *Id.* §§ 110.1(b)(1), 110.5.

Section 110.1(h) of the Commission's regulations provides, in pertinent part, as follows:

(h) *Contributions to committees supporting the same candidate.* A person may contribute to a candidate or his or her authorized committee with respect to a particular election and also contribute to a political committee which has supported, or anticipates supporting, the same candidate in the same election, as long as--

...

(2) The contributor does not give with the knowledge that a substantial portion will be contributed to, or expended on behalf of, that candidate for the same election; and

....

Id. § 110.1(h).

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DISCUSSION

A. Club PAC Did Not Accept Excessive Contributions

Club PAC did not accept excessive contributions in 2006 from the seven named individuals. Keating Aff. ¶¶ 4-5 and documentation attached thereto. Aggregate contributions for 2006 from each of the seven named Club members equaled \$5,000, which is the calendar-year contribution limit to multicandidate political committees under the Act, 11 C.F.R. § 110.1(d). *Id.*

The Complaint, using its attached data, alleges that these seven members made contributions to Club PAC in 2006 that were in addition to the contributions listed in Exhibit A to Mr. Keating's affidavit. Such contributions, however, were earmarked candidate contributions, as properly reported in Club PAC's reports. *Id.* ¶ 8 and Exhibit B thereto (providing Club PAC reports with respect to the earmarked candidate contributions). As contributions written or charged directly to candidates, these contributions are not aggregated against the individuals' \$5,000 contribution limit to Club PAC. Accordingly, based on the actual contributions to Club PAC, Club PAC did not accept any excessive contributions in 2006 from these seven individual members.

B. Respondents Did Not Violate or Cause Other Persons To Violate the Act Through 11 C.F.R. § 110.1(h)

The Complaint alleges that individuals who contributed to both Club PAC and Walberg for Congress violated the contribution limits with respect to Walberg for Congress because of the operation of section 110.1(h) of the Commission's regulations. This charge rests on an unfounded allegation that Club PAC told contributors that their contributions would be used to support Walberg for Congress.

These allegations are plainly false. Club PAC solicitations in no way indicated that Club PAC funds received in connection with solicitations for the PAC would be used to support Walberg for Congress. Further, contributors could not be charged with the knowledge that their funds would be expended for or contributed to Walberg for Congress since Club PAC itself had no such knowledge. *See* Keating Aff. ¶ 10. As a result, no contributor to both Club PAC and Walberg for Congress made excessive contributions to Walberg for Congress.

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1. Club PAC Did Not Know In Advance How It Would Use Its Funds

Club PAC does not know in advance for whom it is going to make independent expenditures or contributions or in what amounts until the decision to make an expenditure or contribution is made. *Id.* ¶ 10. The final decisions are based upon political and financial factors that “change by the hour.” *Id.* Factors include cash on hand, polls, likelihood of victory, a candidate’s views on issues, an incumbent’s votes, and an opponent’s activities, funding, and campaign advertisements. *Id.* Since Club PAC does not know its future involvement in races until the very last moment, it would be impossible for it to relay to PAC contributors the information that it does not possess.¹ *See id.*

2. Complaint and Other Evidence Show That Club PAC Did Not Inform Contributors of Any Use for the Walberg Campaign

Club PAC does not inform contributors as to how their contributions will be used, other than to support candidates generally. *Id.* ¶ 11. In the same vein, Club PAC did not inform contributors that their contributions would be used to support Walberg for Congress. *Id.* ¶ 12. The Complaint itself provides additional information to support this sworn testimony of Mr. Keating.

First, the purported CFG member communication attached to the Complaint as Exhibit 2 is a permissible joint fundraising solicitation. The communication, however, vividly separates its pitch for Club PAC from the solicitations for the candidates, discussing candidates in general terms in the PAC section of the joint solicitation. In the Club PAC section of the solicitation, CFG does not mention Laffey, Walberg, or their races.

In fact, the text of Exhibit 2 contradicts the allegations in the Complaint. The whole tenor of the solicitation is that there are many unnamed races across the country (“in race after race, state after state”) in which Club PAC would like to participate if it receives adequate funding from members. This appeal contrasts fully with the sections soliciting candidate contributions for specific races. The

¹ From Club PAC’s FEC reports and from paragraph 14 of the Complaint, it is clear that Club PAC was involved in many races around the country.

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candidate sections are about Laffey and Walberg and their opponents, while the other section sells softly on behalf of the other, unnamed candidates who do not have the pull of these two challengers (*e.g.*, "Build the Club for Growth PAC").

Second, the purported Toomey email attached to the Complaint as Exhibit 3 also contradicts the Complaint's allegations. This email is dated August 9, 2006, the day after the Michigan primary contest between Walberg and Schwarz. As a result, such information was not received by contributors to Club PAC until the pertinent primary was over and could not have informed contributors to Club PAC as to the use of the PAC funds for the Walberg campaign before this date.

In the end, the Complaint provides no information that could fulfill the "knowledge" requirement of section 110.1(h) and there is no such information. Club PAC itself, when it solicited PAC funds, did not know how it would use the contributions, and, in any event, did not inform contributors that their funds would be used to support Walberg for Congress.

CONCLUSION

In sum, respondents neither received excessive contributions to Club PAC in 2006 nor violated, or caused others to violate, the Act through the operation of 11 C.F.R. § 110.1(h). The Commission therefore should find no reason to believe that Respondents violated the Act and should dismiss them from this Matter.

Sincerely,



Carol A. Laham
D. Mark Renaud

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of Club for Growth, Inc. PAC
et al.

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)
)

MUR 5881

AFFIDAVIT OF DAVID KEATING

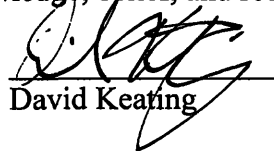
DAVID KEATING, first being duly sworn, deposes and says:

1. I am David Keating. I am the Executive Director of the Club for Growth, Inc. ("CFG").
2. I have read the complaint in Matter Under Review 5881 filed by Matt Marsden on behalf of Schwarz for Congress.
3. Club for Growth, Inc. PAC ("Club PAC") is a duly registered and reporting multicandidate political committee.
4. Attached hereto at Exhibit A is a list of the 2006 contributions to Club PAC received from the seven individuals named in the Complaint: Bruce Bent, Robert T.E. Lansing, David B. MacNeil, Virginia Manheimer, Lester L. Weindling, William T. Wolf, and Betty K. Wolfe.
5. The aggregate 2006 contributions to Club PAC from each individual was \$5,000.
6. These seven named individuals are members of CFG.
7. On January 11, 2007, Club PAC amended its reports to account for the \$1,500 contribution received from Robert T.E. Lansing on August 11, 2006.
8. The other contributions by these seven members that the Complaint categorizes as contributions to Club PAC were in fact earmarked candidate contributions that were properly forwarded and reported by Club PAC. See the pages from Club PAC Federal Election Commission reports attached hereto at Exhibit B.
9. Club PAC transmits and reports earmarked contributions to candidates in accordance with 11 C.F.R. § 102.6.
10. Club PAC was not in a position to inform contributors how Club PAC funds would be used in any given election cycle. Club PAC does not know how its funds are going to be used until they are in fact expended. The final decisions about candidate contributions and independent expenditures involves complex political and financial decisions, the factors of which change by the hour. These factors include cash-on-hand, polls, likelihood of victory, a candidate's views on issues, an incumbent's votes, and the opponent's activities, funding, and campaign advertisements.

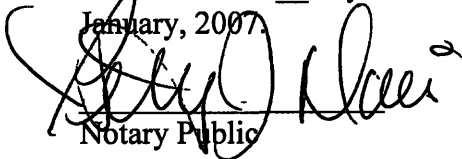
11. When soliciting contributions, Club PAC does not inform contributors as to the allocation of Club PAC funds, other than to support candidates generally.

12. Club PAC made no predetermination that it would expend funds to support Walberg for Congress. In seeking Club PAC contributions, Club PAC did not inform contributors to Club PAC that PAC contributions would be used to support Walberg for Congress.

Under penalty of perjury and any other penalties possibly applicable under law, I swear that the foregoing statements are true to the best of my knowledge, belief, and recollection.


David Keating

Sworn and subscribed to
Before me this 11 day of
January, 2007.


Notary Public

My commission expires: September 14, 2009

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EXHIBIT A
AFFIDAVIT OF DAVID KEATING

Contributions to Club PAC

| Contributor | Date Contribution Received | Contribution Amount |
|---------------------|-----------------------------------|----------------------------|
| Bruce Bent | April 20, 2006 | \$5,000 |
| Robert T.E. Lansing | March 6, 2006 | \$500 |
| Robert T.E. Lansing | April 3, 2006 | \$2,000 |
| Robert T.E. Lansing | July 25, 2006 | \$1,000 |
| Robert T.E. Lansing | August 11, 2006 | \$1,500 |
| David B. MacNeil | June 26, 2006 | \$5,000 |
| Virginia Manheimer | May 30, 2006 | \$5,000 |
| Lester L. Weindling | January 30, 2006 | \$2,500 |
| Lester L. Weindling | March 1, 2006 | \$2,500 |
| William T. Wolf | April 10, 2006 | \$5,000 |
| Betty K. Wolfe | February 23, 2006 | \$2,000 |
| Betty K. Wolfe | March 24, 2006 | \$1,500 |
| Betty K. Wolfe | June 1, 2006 | \$1,500 |

EXHIBIT B
AFFIDAVIT OF DAVID KEATING

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**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**Use separate schedule(s)
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Detailed Summary PageFOR LINE NUMBER. PAGE 41 / 742
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Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

| | |
|--|---|
| NAME OF COMMITTEE (In Full) CLUB FOR GROWTH INC PAC | |
| A Full Name (Last, First, Middle Initial) Bruce Bem Mailing Address 125D Broadway 32nd Floor City State Zip Code New York NY 10021 FEC ID number of contributing federal political committee C Name of Employer The Reserve Funds Receipt For 2006 X Primary General Other (specify) ▼ | Date of Receipt 01 / 24 / 2006 Transaction ID: SA11A1 66449 Amount of Each Receipt this Period 2000.00 Earmarked Cuellar for Cong House TX-28 [MEMO ITEM] |
| B Full Name (Last, First, Middle Initial) Benjamin Bernstein Mailing Address 1115 South Main St City State Zip Code Bel Air MD 21014 FEC ID number of contributing federal political committee C Name of Employer Bernste-Robinson Receipt For 2006 X Primary General Other (specify) ▼ | Date of Receipt 01 / 04 / 2006 Transaction ID: SA11A1 66450 Amount of Each Receipt this Period 20.00 Earmarked Laffey for Senate Sen-RI [MEMO ITEM] |
| C Full Name (Last, First, Middle Initial) Herbert Bernstein Mailing Address 9425 Via Patricia City State Zip Code Burbank CA 91504-1325 FEC ID number of contributing federal political committee C Name of Employer n a Receipt For 2006 X Primary General Other (specify) ▼ | Date of Receipt 01 / 30 / 2006 Transaction ID: SA11A1 66451 Amount of Each Receipt this Period 50.00 Earmarked Angle for Cong House NV-02 [MEMO ITEM] |
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FEC Schedule A (Form 3X) Rev 02/2005

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**SCHEDULE A (FEC Form 3X)
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Detailed Summary PageFOR LINE NUMBER: PAGE 1798 / 3594
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NAME OF COMMITTEE (In Full)
CLUB FOR GROWTH INC PAC

| | | |
|---|--|---|
| A Full Name (Last, First, Middle Initial) Betty Wolfe Mailing Address 1600 Texas St Apt 1611 City Fort Worth State TX Zip Code 76102 FEC ID number of contributing federal political committee C Name of Employer n/a Occupation Retired Receipt For 2006 X Primary General Other (specify) Aggregate Year-to-Date 00 | | Date of Receipt 06 / 01 / 2006 Transaction ID: SA11A1 67434 Amount of Each Receipt this Period 1000.00 Earmarked Calvey for Cong. House OK-5 [MEMO ITEM] |
| B. Full Name (Last, First, Middle Initial) Betty Wolfe Mailing Address 1600 Texas St Apt 1611 City Fort Worth State TX Zip Code 76102 FEC ID number of contributing federal political committee C Name of Employer n/a Occupation Retired Receipt For 2006 X Primary General Other (specify) Aggregate Year-to-Date .00 | | Date of Receipt 06 / 13 / 2006 Transaction ID: SA11A1 67431 Amount of Each Receipt this Period 500.00 Earmarked Angle for Cong House NV-2 [MEMO ITEM] |
| C. Full Name (Last, First, Middle Initial) Betty Wolfe Mailing Address 1600 Texas St Apt. 1611 City Fort Worth State TX Zip Code 76102 FEC ID number of contributing federal political committee C Name of Employer n/a Occupation Retired Receipt For 2006 X Primary General Other (specify) Aggregate Year-to-Date .00 | | Date of Receipt 06 / 13 / 2006 Transaction ID: SA11A1 67438 Amount of Each Receipt this Period 500.00 Earmarked Lamborn for Cong House CD-6 [MEMO ITEM] |
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FEC Schedule A (Form 3X) Rev 02/2003

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NAME OF COMMITTEE (In Full)
CLUB FOR GROWTH INC PAC

| | | |
|--|--|---|
| A Full Name (Last, First, Middle Initial) Betty Wolfe Mailing Address 1600 Texas St Apt 1611 City Fort Worth State TX Zip Code 76102 FEC ID number of contributing federal political committee C Name of Employer na Occupation Retired Receipt For 2006 Aggregate Year-to-Date ▼ X Primary General 00 Other (specify) ▼ | | Date of Receipt 06 20 2006 Transaction ID: SA11A1 67433 Amount of Each Receipt this Period 500.00 Earmarked Walberg for Cong House MI-7 [MEMO ITEM] |
| B Full Name (Last, First, Middle Initial) Betty Wolfe Mailing Address 1600 Texas St Apt 1611 City Fort Worth State TX Zip Code 76102 FEC ID number of contributing federal political committee C Name of Employer na Occupation Retired Receipt For 2006 Aggregate Year-to-Date ▼ X Primary General 00 Other (specify) ▼ | | Date of Receipt 06 20 2006 Transaction ID: SA11A1 67435 Amount of Each Receipt this Period 500.00 Earmarked Calvey for Cong House OK-5 [MEMO ITEM] |
| C Full Name (Last, First, Middle Initial) Thomas Wolfe Mailing Address 888 Blvd of the Arts #1807 City Sarasota State FL Zip Code 34238-4856 FEC ID number of contributing federal political committee C Name of Employer Sarasota County Attorneys Office Occupation Attorney Receipt For 2006 Aggregate Year-to-Date ▼ X Primary General 00 Other (specify) ▼ | | Date of Receipt 06 21 2006 Transaction ID: SA11A1 69287 Amount of Each Receipt this Period 100.00 Earmarked Walberg for Cong House MI-7 [MEMO ITEM] |
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FEC Schedule A (Form 3X) Rev 02/2003

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**SCHEDULE A (FEC Form 3X)
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NAME OF COMMITTEE (In Full)
CLUB FOR GROWTH INC PAC

| | | |
|--|--|--|
| A Full Name (Last, First, Middle Initial) William Wolf Mailing Address PD Box 903 City Mount Wolf State PA Zip Code 17347-1803 FEC ID number of contributing federal political committee. C Name of Employer n/a Occupation retired Receipt For: 2006 X Primary General Other (specify) ▼ Aggregate Year-to-Date ▼ 00 | | Date of Receipt 06 26 2006 Transaction ID: SA11A1 88802 Amount of Each Receipt this Period 2100 00 Earmarked Lamborn for Cong House CO-5 [MEMO ITEM] |
| B Full Name (Last, First, Middle Initial) Betty Wolfe Mailing Address 1800 Texas St Apt 1811 City Fort Worth State TX Zip Code 76102 FEC ID number of contributing federal political committee. C Name of Employer n/a Occupation Retired Receipt For: 2006 Primary General Other (specify) ▼ Aggregate Year-to-Date ▼ 5000 00 | | Date of Receipt 06 01 2006 Transaction ID: SA11A1 64633 Amount of Each Receipt this Period 1500 00 |
| C Full Name (Last, First, Middle Initial) Betty Wolfe Mailing Address 1800 Texas St Apt 1811 City Fort Worth State TX Zip Code 76102 FEC ID number of contributing federal political committee. C Name of Employer n/a Occupation Retired Receipt For: 2006 X Primary General Other (specify) ▼ Aggregate Year-to-Date ▼ .00 | | Date of Receipt 06 01 2006 Transaction ID: SA11A1 67432 Amount of Each Receipt this Period 1000 00 Earmarked Walberg for Cong House MI-7 [MEMO ITEM] |
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NAME OF COMMITTEE (In Full)
CLUB FOR GROWTH INC PAC

| | | |
|---|--|---|
| A Full Name (Last, First, Middle Initial) William Wolf Mailing Address PD Box 903 City Mount Wolf State PA Zip Code 17347-1903 FEC ID number of contributing federal political committee C Name of Employer n/a Occupation retired Receipt For 2006 X Primary General Other (specify) ▼ Aggregate Year-to-Date ▼ 00 | | Date of Receipt 06 / 19 / 2006 Transaction ID: SA11A1 88598 Amount of Each Receipt this Period 1000 00 Earmarked, Angle for Cong House NV-2 [MEMO ITEM] |
| B Full Name (Last, First, Middle Initial) William Wolf Mailing Address PD Box 903 City Mount Wolf State PA Zip Code 17347-1903 FEC ID number of contributing federal political committee C Name of Employer n/a Occupation retired Receipt For 2006 X Primary General Other (specify) ▼ Aggregate Year-to-Date ▼ 00 | | Date of Receipt 06 / 19 / 2006 Transaction ID: SA11A1 68601 Amount of Each Receipt this Period 1000 00 Earmarked Lamborn for Cong House CO-5 [MEMO ITEM] |
| C Full Name (Last, First, Middle Initial) William Wolf Mailing Address PD Box 903 City Mount Wolf State PA Zip Code 17347-1903 FEC ID number of contributing federal political committee C Name of Employer n/a Occupation retired Receipt For 2006 X Primary General Other (specify) ▼ Aggregate Year-to-Date ▼ .00 | | Date of Receipt 06 / 26 / 2006 Transaction ID: SA11A1.68599 Amount of Each Receipt this Period 1100 00 Earmarked, Angle for Cong House NV-2 [MEMO ITEM] |
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FEC Schedule A (Form 3X) Rev 02/2003

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NAME OF COMMITTEE (In Full)
CLUB FOR GROWTH INC PAC

| | | |
|---|--|---|
| A Full Name (Last, First, Middle Initial) Robert Wack Mailing Address 1100 North Ridgeland Ave City Oak Park State IL Zip Code 60302-1136 FEC ID number of contributing federal political committee C Name of Employer Info requested Receipt For: 2006 X Primary General Other (specify) ▼ Occupation Info requested Aggregate Year-to-Date ▼ 00 | | Date of Receipt 06 / 27 / 2006 Transaction ID: SA11A1 70045 Amount of Each Receipt this Period 25.00 Earmarked Walberg for Cong House MI-7 [MEMO ITEM] |
| B Full Name (Last, First, Middle Initial) Robert Wack Mailing Address 1100 North Ridgeland Ave City Oak Park State IL Zip Code 60302-1136 FEC ID number of contributing federal political committee C Name of Employer Info requested Receipt For: 2006 X Primary General Other (specify) ▼ Occupation Info requested Aggregate Year-to-Date ▼ 00 | | Date of Receipt 06 / 27 / 2006 Transaction ID: SA11A1 70046 Amount of Each Receipt this Period 25.00 Earmarked Lamborn for Cong House CO-5 [MEMO ITEM] |
| C Full Name (Last, First, Middle Initial) William Wolf Mailing Address PO Box 903 City Mount Wolf State PA Zip Code 17347-1503 FEC ID number of contributing federal political committee C Name of Employer Info requested Receipt For: 2006 X Primary General Other (specify) ▼ Occupation Info requested Aggregate Year-to-Date ▼ 00 | | Date of Receipt 06 / 05 / 2006 Transaction ID: SA11A1 68800 Amount of Each Receipt this Period 2100.00 Earmarked Calvey for Cong House OK-5 [MEMO ITEM] |
| SUBTOTAL of Receipts This Page (optional) | | 0.00 |
| TOTAL This Period (last page this line number only) | | |

FEC Schedule A (Form 3X) Rev 02/2005

26950430493

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**Use separate schedule(s)
or each category of the
Detailed Summary Page

FOR LINE NUMBER. PAGE 493/1743

(check only one)

| | | | | | | | |
|-------------------------------------|-----|--------------------------|-----|--------------------------|-----|--------------------------|----|
| <input checked="" type="checkbox"/> | 11a | <input type="checkbox"/> | 11b | <input type="checkbox"/> | 11c | <input type="checkbox"/> | 12 |
| 13 | 14 | 15 | 16 | 17 | | | |

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (In Full)
CLUB FOR GROWTH INC PAC

| | | |
|---|--|--|
| A Full Name (Last, First, Middle Initial) Jerome Mandel Mailing Address 8899 Compton Drive City Inver Grove Height State MN Zip Code 55076-3398 FEC ID number of contributing federal political committee C Name of Employer na Occupation Retired Receipt For 2006 X Primary General Other (specify) ▼ Aggregate Year-to-Date ▼ 00 | | Date of Receipt 07 10 2006 Transaction ID: SA11A1 88181 Amount of Each Receipt this Period 50.00 Earmarked Lamborn for Cong House OO-5 [MEMO ITEM] |
| B Full Name (Last, First, Middle Initial) Jerome Mandel Mailing Address 8899 Compton Drive City Inver Grove Height State MN Zip Code 55076-3398 FEC ID number of contributing federal political committee C Name of Employer na Occupation Retired Receipt For 2006 X Primary General Other (specify) ▼ Aggregate Year-to-Date ▼ 00 | | Date of Receipt 07 10 2006 Transaction ID: SA11A1 88182 Amount of Each Receipt this Period 50.00 Earmarked Walberg for Cong House MI-07 [MEMO ITEM] |
| C Full Name (Last, First, Middle Initial) Virginia Manheimer Mailing Address P O Box 8D City Lambertville State NJ Zip Code 08530 FEC ID number of contributing federal political committee C Name of Employer Self Occupation Investor Receipt For 2006 X Primary General Other (specify) ▼ Aggregate Year-to-Date ▼ .00 | | Date of Receipt 07 10 2006 Transaction ID: SA11A1 88563 Amount of Each Receipt this Period 1100.00 Earmarked Angle for Cong House NV-02 [MEMO ITEM] |
| SUBTOTAL of Receipts This Page (optional) | | 0.00 |
| TOTAL This Period (last page this line number only) | | |

FEC Schedule A (Form 3X) Rev 02/2003

27044183448

26950430460

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**Use separate schedule(s)
or each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 460/1743

(check only one)

| | | | |
|---|------------------------------|------------------------------|-----------------------------|
| <input checked="" type="checkbox"/> 11a | <input type="checkbox"/> 11b | <input type="checkbox"/> 11c | <input type="checkbox"/> 12 |
| <input type="checkbox"/> 13 | <input type="checkbox"/> 14 | <input type="checkbox"/> 15 | <input type="checkbox"/> 16 |
| <input type="checkbox"/> 17 | | | |

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NAME OF COMMITTEE (In Full)
CLUB FOR GROWTH INC PAC

| | | |
|---|--|--|
| A Full Name (Last, First, Middle Initial) Robert Lansing Mailing Address 270 Westminister #300 City Lake Forest State IL Zip Code 60045 FEC ID number of contributing federal political committee C Name of Employer Litchfield Advisors Inc Occupation Real Estate Receipt For Primary General Other (specify) <input type="checkbox"/> Aggregate Year-to-Date 3500.00 | | Date of Receipt 07 / 25 / 2006 Transaction ID: SA11A1 85885 Amount of Each Receipt this Period 1000.00 |
| B Full Name (Last, First, Middle Initial) Robert Lansing Mailing Address 270 Westminister #300 City Lake Forest State IL Zip Code 60045 FEC ID number of contributing federal political committee C Name of Employer Litchfield Advisors Inc Occupation Real Estate Receipt For 2006 X Primary General Other (specify) <input type="checkbox"/> Aggregate Year-to-Date .00 | | Date of Receipt 07 / 25 / 2006 Transaction ID: SA11A1 87008 Amount of Each Receipt this Period 1000.00 Earmarked Lamborn for Cong House CO-5 [MEMO ITEM] |
| C Full Name (Last, First, Middle Initial) Robert Lansing Mailing Address 270 Westminister #300 City Lake Forest State IL Zip Code 60045 FEC ID number of contributing federal political committee C Name of Employer Litchfield Advisors Inc Occupation Real Estate Receipt For 2006 X Primary General Other (specify) <input type="checkbox"/> Aggregate Year-to-Date .00 | | Date of Receipt 07 / 25 / 2006 Transaction ID: SA11A1 87009 Amount of Each Receipt this Period 1000.00 Earmarked Walberg for Cong House MI-07 [MEMO ITEM] |
| SUBTOTAL of Receipts This Page (optional) | | 1000.00 |
| TOTAL This Period (last page this line number only) | | |

FEC Schedule A (Form 3X) Rev 02/2003

26960534889

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**Use separate schedule(s)
or each category of the
Detailed Summary PageFOR LINE NUMBER: PAGE 1730 / 3504
(check only one)

| | | | |
|---|------------------------------|------------------------------|-----------------------------|
| <input checked="" type="checkbox"/> 11a | <input type="checkbox"/> 11b | <input type="checkbox"/> 11c | <input type="checkbox"/> 12 |
| <input type="checkbox"/> 13 | <input type="checkbox"/> 14 | <input type="checkbox"/> 15 | <input type="checkbox"/> 16 |
| <input type="checkbox"/> 17 | | | |

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NAME OF COMMITTEE (In Full)
CLUB FOR GROWTH INC PAC

| | | |
|--|--|--|
| A Full Name (Last, First, Middle Initial) Roy Weiland Mailing Address 18 Rolling Hill Court City Madison State NJ Zip Code 07940 FEC ID number of contributing federal political committee C Name of Employer n/a Occupation Retired Receipt For: 2006 X Primary General Other (specify) ▼ Aggregate Year-to-Date ▼ 00 | | Date of Receipt 06 / 26 / 2006 Transaction ID: SA11A1 66441 Amount of Each Receipt this Period 100.00 Earmarked Walberg for Cong House MI-7 [MEMO ITEM] |
| B Full Name (Last, First, Middle Initial) Roy Weiland Mailing Address 18 Rolling Hill Court City Madison State NJ Zip Code 07940 FEC ID number of contributing federal political committee C Name of Employer n/a Occupation Retired Receipt For: 2006 X Primary General Other (specify) ▼ Aggregate Year-to-Date ▼ 00 | | Date of Receipt 06 / 26 / 2006 Transaction ID: SA11A1 66442 Amount of Each Receipt this Period 100.00 Earmarked Lamborn for Cong House CO-5 [MEMO ITEM] |
| C Full Name (Last, First, Middle Initial) Leiter Weidling Mailing Address 515 Madison Avenue Suite 27 East City New York State NY Zip Code 10022-5422 FEC ID number of contributing federal political committee C Name of Employer none Occupation Real Estate Investments Receipt For: 2006 X Primary General Other (specify) ▼ Aggregate Year-to-Date ▼ 00 | | Date of Receipt 06 / 05 / 2006 Transaction ID: SA11A1 68364 Amount of Each Receipt this Period 800.00 Earmarked Calvey for Cong House OK-5 [MEMO ITEM] |
| SUBTOTAL of Receipts This Page (optional) | | 0.00 |
| TOTAL This Period (last page this line number only) | | |

FEC Schedule A (Form 3X) Rev 02/2003

26950430489

SCHEDULE A (FEC Form 3X)**ITEMIZED RECEIPTS**Use separate schedule(s)
or each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 489 / 1743

(check only one)

| | | | |
|---|------------------------------|------------------------------|-----------------------------|
| <input checked="" type="checkbox"/> 11a | <input type="checkbox"/> 11b | <input type="checkbox"/> 11c | <input type="checkbox"/> 12 |
| <input type="checkbox"/> 13 | <input type="checkbox"/> 14 | <input type="checkbox"/> 15 | <input type="checkbox"/> 16 |
| <input type="checkbox"/> 17 | | | |

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NAME OF COMMITTEE (In Full)
CLUB FOR GROWTH INC PAC

| | | |
|--|--|--|
| A Full Name (Last, First, Middle Initial) Douglas MacGray Mailing Address 105 Stone Crop Road City State Zip Code Wilmington DE 10810 FEC ID number of contributing federal political committee C Name of Employer Andes Strategies Inc. Occupation Executive Receipt For 2006 X Primary General Other (specify) Aggregate Year-to-Date 00 | | Date of Receipt 07 28 2006 Transaction ID: SA11A1 86877 Amount of Each Receipt this Period 500 Earmarked Laffey for Sen Senate-R1 [MEMO ITEM] |
| B Full Name (Last, First, Middle Initial) David Macneil Mailing Address 79 Pine Street City State Zip Code Chatham NJ 07928-1627 FEC ID number of contributing federal political committee C Name of Employer Silvercrest Asset Management Group Occupation executive Receipt For 2006 X Primary General Other (specify) Aggregate Year-to-Date 00 | | Date of Receipt 07 28 2006 Transaction ID: SA11A1 87496 Amount of Each Receipt this Period 1000 00 Earmarked Wallberg for Cong House MI-07 [MEMO ITEM] |
| C Full Name (Last, First, Middle Initial) Dolores Madlener Mailing Address 3805 W. 103rd Street City State Zip Code Chicago IL 60655 FEC ID number of contributing federal political committee C Name of Employer Catholic New World Occupation writer Receipt For 2006 X Primary General Other (specify) Aggregate Year-to-Date .00 | | Date of Receipt 07 19 2006 Transaction ID: SA11A1 87042 Amount of Each Receipt this Period 20 00 Earmarked Wallberg for Cong House MI-07 [MEMO ITEM] |
| SUBTOTAL of Receipts This Page (optional) | | 0.00 |
| TOTAL This Period (last page this line number only) | | |

FEC Schedule A (Form 3X) Rev 02/2003